## UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

JANE DOE,

Plaintiff,

V.

WILLIAM B. LEE, Governor of the State of Tennessee, *in his official capacity* (DISMISSED);

DAVID RAUSCH, Director of the Tennessee Bureau of Investigation, in his official capacity,

Defendants.

Case No. 3:23-cv-00965

**JURY DEMAND** 

**District Judge Trauger** 

Magistrate Judge Newbern

## JOINT MOTION TO RESET INITIAL CASE MANAGEMENT CONFERENCE

COMES NOW Plaintiff Jane Doe and Defendant Rausch ("the Parties"), by and through respective undersigned counsel, and respectfully request this Honorable Court either reset or temporarily cancel the Initial Case Management Conference currently set for November 18, 2024 at 4pm in order for a Motion for Judgment on the Pleadings under Rule 12(c) of the Federal Rules of Civil Procedure to be filed and resolved.

The Parties propose the following briefing schedule to expeditiously present their arguments to the Court:

- 1. Plaintiff shall file a Motion by November 29, 2024.
- 2. Defendants shall file a Response in Opposition by December 13, 2024.
- 3. If Plaintiff elects to file a Reply, it shall be filed by December 20, 2024.

Because this Court's ruling on a Motion under Rule 12(c) may considerably narrow discovery or, potentially, resolve the case entirely, the Parties request the Court stay further scheduling of the case to first resolve Plaintiff's Motion.

Respectfully submitted:

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing has been served via the Court's electronic filing system this 29th day of October, 2024 on the following:

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> <u>s/ Davis F. Griffin</u> Davis Fordham Griffin